

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA  
ERIE DIVISION**

ROBERT TROHA and FREDERICK BIGNALL	)	
on behalf of themselves and all others	)	
similarly situated,	)	
	)	
Plaintiff,	)	
vs.	)	
	)	Civil Action No. 05-191-E
THE UNITED STATES OF AMERICA,	)	
	)	
Defendant.	)	
	)	

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**UNOPPOSED MOTION FOR AN EXTENSION OF TIME**

Plaintiffs, Robert Troha and Frederick Bignall, for themselves and all others similarly situated, through counsel, hereby move for a one-week extension of time to file their opposition to Defendant's motion for summary judgment and their reply in support of Plaintiffs' cross-motion for summary judgment. In support of their Motion, Plaintiffs aver:

1. On January 18, 2007, Defendant filed its opposition to Plaintiffs' motion for partial summary judgement and cross moved for summary judgment
2. Per the scheduling Order entered by the Court on November 27, 2006, Plaintiffs' opposition and reply are due on February 9, 2007.
3. Plaintiffs' counsel has worked diligently to respond to Defendant's opposition and cross motion for summary judgement. However, due to both the complexity of the issues, as well as the necessity to review and analyze the specific deeds and conveyancing instruments relevant to this case, counsel requires additional time.
4. Plaintiffs respectfully request an extension of seven (7) days to file their opposition

to Defendant's motion for summary judgment and their reply in support of Plaintiffs' motion.

5. Counsel of record for Defendant has stated that she does not oppose Plaintiffs' motion.

6. Plaintiffs do not believe that extending the briefing schedule by one week will affect the hearing presently scheduled for March 15, 2007 on the parties' cross-motions for summary judgment.

WHEREFORE, Plaintiffs respectfully request that they be granted a one-week extension of time, until and through February 16, 2007, to file their opposition to Defendant's motion for summary judgment and their reply in support of their motion for summary judgment.

Respectfully submitted,

s/David A. Cohen  
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Counsel of Record for Plaintiffs

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Dated: February 7, 2007

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 7<sup>th</sup> day of February, the foregoing Unopposed Motion for an Extension of Time was electronically filed with the Clerk of the Court using the CM/ECF system, which, in turn, forwarded the same to the following counsel of record.

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/s/David A. Cohen